

**TECHNICAL REVIEW DOCUMENT
For
OPERATING PERMIT 01OPEP239**

Tegant Diversified Brands, Inc
El Paso County
Facility ID: 0410307

Prepared by Geoffrey Drissel
June 2009

1. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued August 1, 2002. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted July 25, 2006 and additional information submitted July 19, 2007. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit..

2. Source Description

The Tegant facility is a custom-shape molder that molds expandable polystyrene (EPS), similar polystyrene-based polymers (such as T-grade bead), and ARCEL (a polystyrene/polyethylene copolymer) into products for packaging, materials handling, and structural component uses. These polymeric resins are received in bead form, then expanded and fused into molded products through a series of steps. The four major steps involved in this process are: 1) Pre-expansion---partial expansion of raw beads in preparation for molding, 2) Pre-puff storage---aging and storage of the pre-expanded beads prior to molding, 3)

Molding---fusing of beads into various shapes, and 4) Storage---warehousing of molded products. The facility falls under the Standard Industrial Classification 3086.

The facility is located at 1100 Garden Of The Gods Road in Colorado Springs, Colorado. This area is designated as an attainment area for all criteria pollutants. Based on the information provided by the applicant, it is not categorized as a major stationary source for PSD applicability purposes (no single criteria pollutant emissions with a Potential to Emit of greater than 250 TPY) as of the issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21. Any future modification which is major by itself (Potential to Emit of > 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

There are no affected states within 50 miles of this facility, and there are no Federal Class I designated areas within 100 kilometers of the facility. There are no emission points at this facility that use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. Consequently, no emission points are subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV. Facility-wide emissions are outlined in the table below:

Facility-Wide Emissions

Pollutant	Potential-to-Emit Emissions (tons/yr)	2007 Actual Emissions (tons/yr)
CO	6.6	1.6
NO _x	20.0	4.8
SO ₂	9.0	0.0
VOCs	170.8	88.4
Single HAP	8.0	0.6
Combined HAPs	20.0	1.6

The equipment at this facility include two boilers, used for the production of steam, and the various equipment used in the foam manufacturing process. The boilers at this facility are designed to combust both natural gas and No. 2 fuel oil. Therefore, the emission limits are based on worst-case emissions for either fuel. The greatest amount of CO and NO_x emissions will be emitted when the boilers are fired with natural gas. The greatest amount of SO₂ emission will be emitted when the boilers are fired with No. 2 fuel oil. The CO and NO_x potential-to-emit emissions are based on both boilers operating for 8760 hours per year on natural gas. The SO₂ potential-to-emit emissions are based on the boilers combusting 245,000 gallons of No. 2 fuel oil, where the oil contains 0.5% sulfur, by weight. The VOCs and HAPs potential-to-emit emissions are based on the enforceable limits that the source has taken for the facility. The actual emissions represent the values that were reported during a facility inspection conducted on January 29, 2008.

3. Discussion of Modifications Made:

Source Requested Modifications

The source requested the following changes to the permit in their renewal application:

Page following Cover Page

Revise the company name to Tegrant Diversified Brands, Inc.

Change the Facility Contact Person

Revise Section II.2 to change fuel recordkeeping requirement to a monthly basis

Revise Section II.2 to allow the calculation of natural gas emissions from the boilers to be based on a default value of 1000 Btu/scf.

Note that the source also requested a change to allow annual reporting of fuel usage when no fuel oil is burned. This issue has previously been discussed between the source and the Division's enforcement group and the source has agreed to provide semi-annual reports.

Other Modifications

In addition to the requested changes, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

Section I

Condition 1.4 was revised to reflect the most recent references.

Condition 3 as revised to reflect the most current language regarding the PSD status of the source.

Section III – Permit Shield

The shield citation was updated to reflect the most current reference.

Section IV – General Conditions

The General Conditions section was replaced with the most current version.

Appendices

Appendices B and C were replaced with the most current versions.

The EPA addresses in Appendix D were updated.